## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER DISASTER SITE LITIGATION

21 MC 100 (AKH)

THIS DOCUMENT RELATES TO ALL CASES

## CERTIFICATION OF ANDREW J. CARBOY SUBMITTED IN RESPONSE TO THE COURT'S AUGUST 17, 2010 ORDER

Andrew J. Carboy, an attorney duly admitted to practice law in the State of New York and the Southern District of New York, being duly sworn, deposes and says as follows:

- 1. I am a member of the law firm of Sullivan Papain Block McGrath & Cannavo P.C. ("Sullivan Papain"), a firm serving as Co-Liaison Counsel for the plaintiffs in 21 MC 100. This office represents 689 plaintiffs in the litigation.
- 2. Pursuant to the Court's August 17, 2010 Order governing the production of certain information in advance of the scheduled August 20, 2010 hearing, Sullivan Papain responds as follows.
- 3. Sullivan Papain did not borrow funds to finance its World Trade Center cases. As this office has no loans to repay, Sullivan Papain does not seek the approval of

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interest and/or finance charges as reasonable and necessary expenses against its clients' recoveries.

Dated: New York, New York August 18, 2010

Respectfully submitted,

SULLIVAN PAPAIN BLOCK MCGRATH & CANNAVO P.C.

By: / Andrew J. Carbox (AC 2147)

Attorneys for Plaintiffs

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